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Please see attached comments.

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# IRRIGATION & ELECTRICAL DISTRICTS ASSOCIATION OF ARIZONA

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April 30, 2007

Regional Director, Lower Colorado River Region  
Bureau of Reclamation  
Attn: BCOO-1000  
P.O. Box 61470  
Boulder City, Nevada 89006-1470

Re: Comments on the Draft Environmental Impact Statement for the Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead, 72 Fed.Reg. 9026, et seq. (February 28, 2007)

The following comments are submitted on behalf of the Irrigation & Electrical Districts Association of Arizona, a statewide association of 24 Members and Associate Members that contract for and receive power from Glen Canyon Dam, Hoover Dam, the Parker-Davis Project and the Navajo Generating Station. As such, our Members and Associate Members are directly impacted by the proposed Interim Guidelines.

The Irrigation & Electrical Districts Association of Arizona (IEDA) was founded in 1962 and represents the interests of its membership concerning federal hydropower resources generated on the Colorado River. Since 1962, IEDA has been intimately involved in the development of legislation, regulations, environmental analyses and other activities concerning power generation on the Colorado River.

IEDA wishes to compliment the Bureau of Reclamation on its thorough analysis of the resources subject of this DEIS and, specifically, with its analysis of hydropower resources and proposed impacts on those resources from implementation of any of the alternatives analyzed in the DEIS.

Having said that, however, we are mindful of the comments already submitted by the Colorado River Energy Distributors Association (CREDA), of which IEDA is a member, and the careful and specific analysis of necessary changes in the DEIS that those comments identify. We totally support those comments.

We wish to draw Reclamation's attention specifically to the economic analysis and forecast comments on page 2 of the CREDA comments. We do so because we feel one shortcoming of the DEIS is its failure to adequately appreciate the future value of peaking power from hydropower facilities managed by the Bureau of Reclamation on the Colorado River. As demand for electricity

continues to increase, demand for peaking power will increase also, perhaps even more rapidly than demand for base load. There are numerous studies available that supply such forecasts in peer reviewed analyses. Limitations on the use of Glen Canyon Dam especially as a peaking power resource, and to a lesser extent Hoover Dam, will cause the utilities that contract for those resources to seek other sources of peaking power. It is reasonable to assume that other hydropower resources will also be fully committed and overcommitted, especially in a region-wide drought. Thus, the alternative peaking power resources will come from fossil fuel sources. The DEIS does not recognize this fact nor attempt to analyze the increase in fossil fuel electric power demand that will be created when these Shortage Sharing Guidelines need to be implemented. Since Congress has recognized the value of hydropower over a long history, in such provisions as Section 5 of the Colorado River Storage Project Act of 1956, the final EIS needs to recognize this value also and to recognize the increased demand on the fossil fuel portion of the regional generation supply that utilization of the Shortage Sharing Guidelines will produce.

The final EIS also needs to recognize that there will be a concomitant increase in greenhouse gas emissions from lesser availability of federal hydropower on the Colorado River. Since these alternative generation resources are less nimble than hydropower, more of them will be required to cover the same real time demand than a hydropower facility would otherwise supply. This factor needs to be recognized in the final EIS as well.

The final EIS also needs to recognize the current status of contracting for the Parker-Davis resource. Compare the statement at page 3-95, line 27, with the statement at page 4-235, lines 34 and 35. Those conflicting statements will both need to be updated as Reclamation finalizes the EIS.

Finally, we note that CREDA believes that the collaborative process being undertaken by the Basin States may continue to refine parameters of the Basin States alternative as described in the DEIS. CREDA asks for further ability to comment on any such refinement. We are under the impression that the refinement process that NEPA can recognize will be reflected in the comments submitted during the comment period on the draft EIS and not thereafter. As Reclamation well knows, should any significant change to the proposed alternatives be considered by Reclamation after the close of the comment period, any such changes would be required to be resubmitted for public comment. Given the timeline that Reclamation has announced for completion of this process, we anticipate that that will not happen. However, should a significant change to any of the alternatives be proposed for consideration, we will assume that Reclamation will reopen the comment period before completing the Environmental Impact Statement process. Such action would be required to maintain the integrity of the process.

Thank you for the opportunity to comment on this most important exercise.

Sincerely,

/s/

Robert S. Lynch  
Counsel and Assistant Secretary-Treasurer

RSL:psr

cc: IEDA Members